Remarks

Claims 1-11 and 13-33 are pending in the above-identified application. By this Amendment, the Applicant has added claim 34. The newly added claim is supported by the application as originally filed, and does not introduce new matter. Particularly, claim 34 differs from claim 1 with regard to encoding the content pages. Support for the difference between claim 1 and claim 34 may be found at page 22, which discusses continuously transmitting each album page for the duration specified. Accordingly, entry of the newly added claim is respectfully requested.

Claim Rejections – 35 U.S.C. §103

The Examiner rejects claims 1, 5-11, 13-20, and 22-33 under 35 U.S.C. §103(a) as being unpatentable over Logan et al. (U.S. Patent No. 5,802,299), in view of Pollock, and further in view of Allport (U.S. Patent No. 6,097,441), and claims 2 and 21 over Logan and Pollock in view of W3C Proposed Recommendations. Although claims 3-4 stand rejected, the Examiner fails in this Office Action to provide the reasoning behind the rejection. The Applicant assumes the claims stand rejected for the reasons stated in the previous Office Action. The Applicant respectfully traverses these rejections, and asserts that the claims pending in the present application are patentable over the references cited by the Examiner for at least the reasons stated below.

Independent claims 1, 17, 20-22, 29, newly added independent claim 34, and the claims dependent thereon, are drawn toward methods and systems for organizing content for presentation to television viewers. The methods and systems use templates that include one or more transformation techniques to create a set of content pages, which are encoded into a video form for broadcasting to television viewers. Newly added claim 34 further recites that the content pages are encoded into a video form for continuously broadcasting each of the content pages to television viewers for a specified duration. As discussed in the March 22, 2005 and the June 16, 2004 telephone interviews with the Examiner, none of the cited references disclose or

otherwise suggest encoding a set, *e.g.*, a plurality, of content pages into a video form that may be broadcast to television viewers.

The Examiner asserts that Allport discloses "encoding the content to be suitable for television display" with reference to col. 13, lines 61-66. The present invention, however, does not merely "encod[e] the content to be suitable for television display." The present invention, however, claims "inserting the transformed content into the templates to thereby create a set of content pages and encoding the set of content pages into a video form for broadcasting to television viewers", which is not asserted by the Examiner as being taught by the cited art.

Allport generally provides a system for viewing digital data on multiple displays, such as on a TV screen and a display on a remote control unit. Abstract. Allport purportedly alleviates the clutter on Internet enabled televisions by parsing Internet content and displaying some parts of the content, such as text or navigational information, on the remote control, and other parts on the television display. Col. 6, lines 49-61. Removing text or navigation information from the image displayed on the television provides more room on the television for displaying a primary image. Col. 6, lines 58-61. Allport retains all of the functionality associated with Internet enabled television, such as navigating to other websites, bookmarking websites, etc. Col. 6, lines 61-64. In this respect, the Allport system must receive each HTML document and display the HTML document as a webpage individually in order to provide Internet functionality, *e.g.*, navigation from a first website to a second website selected by the Internet user with a link in the first website, etc. In order to selectively display webpages on a television in this manner, Allport must convert each webpage into a NTSC or PAL format individually. Col. 13, lines 61-66.

Unlike Allport, independent claims 1, 17, 20-22, and 29 of the present application encode a set of content pages into a video form for broadcasting to television viewers. In this respect, a plurality of content pages are encoded in a form that allows a user of the present invention to broadcast the plurality of content pages in a continuous succession thereby "mak[ing] the experience of viewing Internet content more similar to traditional television viewing" as noted at page 4, lines 8-9 of the present application. The present invention therefore

combines the plurality of content pages into a video presentation for television broadcasting that does not provide the interactivity normally associated with webpages, particularly with respect to navigation.

The differences between Allport and the present invention with regard to encoding may best be appreciated with the following example. Assuming there are five HTML documents each linked to the others. In order to provide television viewers with Internet functionality, Allport must display one of the five documents first and wait for a navigation request from the television viewer before displaying a second, third, forth, fifth, etc. Since Allport does not know the order in which the television viewer will navigate through the documents, Allport must convert each of the documents individually for television display. Col. 6, lines 49-61; col. 13, lines 61-66. In contrast, with regard to claims 1, 17, 20, 21, 22, and 29, the present invention captures the content from the five exemplary HTML documents, transform the content as necessary for broadcasting to television viewers, insert the transformed content into a template to create a set of content pages, and encode the plurality of content pages into a video form for television broadcasting. With regard to claim 34, the present invention encodes the content pages into a video form for continuously broadcasting each of the content pages to television viewers for a specified duration. Assuming that each of the five HTML documents are converted to a corresponding content page and that all of the five content pages will be broadcast to television viewers, the present invention will encode all of the five content pages into a video form and thus combine the content pages for television broadcast as a video presentation of the five content pages.

The conversion performed by Allport for displaying individual webpages on a television display is therefore not the same as encoding a set of content pages into a video form television broadcast as recited in the pending independent claims.

Independent claims 1, 17, 20-22, 29, and 34, organize content for presentation to television viewers by transforming captured content in accordance with one or more transformation techniques specified in a template, which is neither disclosed nor otherwise suggested by any of the cited references. The Examiner asserts that Pollack teaches a method of adding a transformation technique to a web page with reference to page 1. The Applicant

respectfully disagrees with the Examiner. Pollack is a tutorial that instructs an author of an HTML page how to set parameters to define the display size (width and height) of an image within a webpage in pixels using the "IMG" tag. When the page is rendered by a rendering application, *e.g.*, a web browser, the application interprets the parameters within an IMG tag to display the image at the appropriate pixel size. Pollock therefore only teaches an author of a web page how to set the size of an image in an HTML document, which is not a transformation technique specified in a template as claimed in each of the independent claims of the present application. Additionally, Pollock is silent with regard to templates.

In addition to the foregoing remarks, there is also no suggestion to combine the references cited by the Examiner. The Examiner asserts that it would have been obvious to combine Allport with Logan and Pollock, because encoding was necessary to enable display on a TV, with reference to Logan col. 13, lines 61-66, and because TV viewing was desirable as it was more convenient for users, with reference to Logan col. 1, lines 54-58. The Applicant respectfully disagrees with the Examiner, as the citations do not support the Examiner's assertions. Indeed Logan is silent with regard to Internet enabled television and television in general.

Logan, Pollock, Allport, and W3C-97 are each directed toward different subject matter and it would therefore not have been obvious to combine the references. Logan provides an interactive system for authoring hypertext document collections, Pollack instructs user with regard to authoring HTML documents, and W3C-97 provides a discussion of HTML frames. Allport, by contrast, provides an Internet enabled television system. Logan, Pollack, and the W3C-97 references therefore discuss hypertext authoring, which is typically performed on a computer, whereas Allport discusses Web-TV, which contains no teaching or suggestion for use in conjunction with hypertext authoring.

The dependent claims of the present application contain additional features that further substantially distinguish the invention of the present application over the art of record. Given the Applicant's position on the patentability of the independent claims, however, it is not deemed necessary at this point to delineate such distinctions.

For the above reasons, the Applicant submits that the present invention, as claimed, is patentable over the references cited by the Examiner. Accordingly, reconsideration and allowance of pending claims 1-34 is therefore respectfully solicited. To expedite prosecution, the Examiner is invited to contact the Applicant's representative at 212-895-2905.

Respectfully submitted,

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Antonio Papageorgiou — Date: March 29, 2005